

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

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**In re:**

**Lordstown Motor Corp., et al.,<sup>1</sup>**

**Debtors.**

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)  
) **Chapter 11**  
)  
) **Case No. 23-10831 (MFW)**  
)  
) **(Jointly Administered)**  
)  
)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE**

**PLEASE TAKE NOTICE** that, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned hereby appears in the above-captioned case as counsel on behalf of Akebono Brake Corporation (“Akebono”) and requests that all notices given or required to be given in this case, including, but not limited to, all orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, and whether transmitted or conveyed by mail, electronic mail, ECF notice, hand delivery, telephone, or otherwise, which affects Akebono or this case to be served upon:

Edward M. King  
FROST BROWN TODD LLP  
400 West Market Street Suite 3200  
Louisville, KY 40202-3363  
(502) 568 0359  
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**PLEASE TAKE FURTHER NOTICE** that this entry of appearance is not intended as nor is it a consent to jurisdiction of the Bankruptcy Court over Akebono specifically but not limited to (i) its right to have final orders in matters entered only after *de novo* reviewed by a District Court judge,

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<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

(ii) its right to a trial by jury in any proceeding to triable herein, or in any case, controversy or proceeding related hereto, (iii) its right to have the reference withdrawn by the District Court in any matter subject to mandatory, or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Akebono is or may be entitled to under agreement, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments it expressly reserves.

Dated: July 12, 2023

Respectfully submitted,

**FROST BROWN TODD LLP**

By: /s/ Edward M. King

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**COUNSEL FOR AKEBONO BRAKE CORPORATION**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 12, 2023, a true and correct copy of the foregoing was served upon all parties receiving CM/ECF noticing.

/s/ Edward M. King  
Edward M. King